

SCHEDULE (I)(v)

JOINT PROPOSED VOIR DIRE

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

DIANE POLAND,)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 04-217 (GMS)
)	
COMPUTER SCIENCES CORP.,)	
)	
Defendant.)	
_____)	

JOINT PROPOSED VOIR DIRE

1. Other than what I have just told you, have you heard, seen or read anything about this case?

2. Have you, someone in your family, or a close friend every been involved in any situation like what you have heard so far about this case?

3. The Defendant in this case is Computer Sciences Corporation, also known as CSC. Are you familiar with CSC?

4. The Plaintiff is represented by Jeff Martin of the law firm Margolis Edelstein. The defendants are represented by Larry Seegull and Amy Beth Leasure of the law firm DLA Piper Rudnick Gray Cary. Do you know any of these lawyers? Have you ever been represented by any of their law firms?

5. The following persons may be called as witnesses or referred to during the trial. If you know of, have heard of, or have any association with any of these people, please stand:

Randall Miller
Dawn Dworsky
Maureen Summers

Mary Anne Doll-Johnson

Sonia Koplowicz

Edwin Derek Alson

Jennifer Miller

Dahl Landers

Simmie Hoeft

Beth Musumeci

Mike Suman

Leanne Thomas

Paul White

Edward Stewart

Jesse Cason

Joseph Hinton

Selma York

Darrin Alexander

Jerry Flowers

Herbert Broadwater

Tia Jackson

Gus Siekierka

Fred Vollrath

Bernie Breen'

Stan Baines

Diane Poland¹

¹ Please note that the names provided are simply a combination of the names listed in Plaintiff's Proposed Voir Dire Question # 6 and Defendant's Proposed Voir Dire Question # 6. Defendant reserves the right to object to any of Plaintiff's proposed witnesses at any time, and also notes that its pending Motion in Limine to Exclude Witnesses Lacking Personal Knowledge, Witnesses Not Identified in Discovery Responses and High Level Executive Witnesses Called Solely for Purposes of Harassment may result in the removal of some witnesses from this list.

6. Have you ever worked for a law firm, had a law related job, or have any legal training?

7. Have you ever worked in the field of human resources?

8. Have you ever been a Plaintiff, Defendant or witness in a civil lawsuit?

9. Have you ever served before as a juror in a civil law suit?

10. Have you or any of your family members or close friends ever worked for any federal, state, or local agency involved in the enforcement of anti-discrimination laws?

11. Have you, someone in your family, or a close friend ever had a claim or complaint of discrimination made against you or them, whether or not it resulted in a lawsuit being filed?

12. Have you, someone in your family, or a close friend ever filed a complaint of discrimination with an employer or an agency or ever filed a lawsuit complaining of discrimination of any kind, whether race, sex, national origin, religion, sexual orientation, age, disability or any other reason?

13. Have you or any of your family members or close friends ever been discriminated against because of race, sex, national origin, religion, sexual orientation, age, disability or any other reason?

14. Have you, someone in your family, or a close friend ever had a significant dispute with a supervisor or employer, even if it did not result in a lawsuit being filed?

15. Have you, someone in your family, or a close friend ever been unfairly disciplined, fired from a job or quit a job because of unfair treatment?

16. Have you, someone in your family, or a close friend ever been denied a promotion because another coworker was considered more qualified or more experienced?

17. Have you, someone in your family, or a close friend ever been asked to testify in a case in which there was an allegation of discrimination?

18. CSC is a corporation. Does anyone have strong negative feelings about corporations?

19. Do you believe that most corporations accused of discrimination or retaliation probably did it?

20. Corporations are entitled to the same fair trial as a private individual. Would you have trouble deciding this result in favor of CSC if the evidence warranted such a result?

21. Do you think that the mere fact that a lawsuit is brought is evidence that the plaintiff has been wronged and should recover?

22. The fact that Diane Poland is no longer working with CSC may cause you to feel sympathy for her. I will instruct you that you must not consider that sympathy as you listed to the evidence and make your decisions. You must consider and decide this case solely on the evidence and law, and not based on sympathy for any party. Do you think that you can follow this instruction?

23. This trial may last up to 4 days. Is there any reason why a trial of this length would present a severe hardship for you?

24. Is there any reason, based on any of the questions I have asked you, or for any other reason that I may not have covered in these questions, that any of you feel that

you could not sit as a juror in this case and fairly and impartially decide this case based solely on the evidence presented and the law as I instruct you on it?